

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD)(SN) ECF Case

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL  
FINAL DEFAULT JUDGMENTS ON BEHALF OF  
BURNETT/IRAN PLAINTIFFS IDENTIFIED AT EXHIBIT A  
(BURNETT / IRAN III)**

PLEASE TAKE NOTICE that upon the accompanying declaration of Robert T. Haefele, with exhibits, and the accompanying memorandum of law, the Plaintiffs identified in Exhibit A to the accompanying declaration of Robert T. Haefele, respectfully move this Court for an Order awarding them (1) solatium damages for the losses they suffered as the immediate family members (in this instance, spouses, parents, children, and siblings, or the estate of a spouse, parent, child, or sibling) of their decedents (as indicated in Exhibit A to the accompanying Declaration of Robert T. Haefele) in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs; (2) compensatory damages for pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11 attacks; (3) economic damages for the plaintiffs identified in the expert reports attached as Exhibits B – D to the Haefele Declaration, dated August 16, 2018, as described in those expert reports; (4) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and (5) permission for the *Burnett/Iran* plaintiffs identified in Exhibit A to seek punitive damages, economic damages, or other damages at a later date, and for all other *Burnett/Iran* Plaintiffs not appearing on Exhibit A,

to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran, the Islamic Revolutionary Guard Corps, and the Central Bank of the Islamic Republic of Iran (collectively, “the Iran Defendants”) on January 31, 2017.

15-cv-9903 ECF No. 85.

Dated: August 16, 2018

/s/ Robert T. Haefele  
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